

1 Rachel S. Doughty (Cal. Bar No. 255904)
2 GREENFIRE LAW, PC
2478 Adeline Street, Suite A
3 Berkeley, CA 94703
4 Ph/Fax: (510) 900-9502
Email: rdoughty@greenfirelaw.com

5
6 *Attorneys for Save Our Forest Association*

7 *Continued following page*
8
9

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **EASTERN DIVISION – RIVERSIDE**

13 SAVE OUR FOREST ASSOCIATION,
14 INC.

15 Plaintiff,

16 vs.

17 UNITED STATES FOREST SERVICE, *et*
18 *al.*,

19
20 Defendants.
21

22 YUHA AVIATAM OF SAN MANUEL
23 NATION, a federally recognized Indian
24 tribe,

25 Defendant-Intervenor.
26
27
28

Case No.: 5:24-cv-01336

**STIPULATION FOR PROPOSED
BRIEFING SCHEDULE**

Action Filed: June 25, 2024
Trial Date: March 31, 2026

1 Andrew A. Smith (NM Bar No. 8341)
2 UNITED STATES DEPARTMENT OF JUSTICE
3 Environment & Natural Resources Division
4 201 Third Street NW, Suite 900
5 Albuquerque, NM 87102
6 Phone: (202) 598-3803
7 Email: andrew.smith@usdoj.gov

8 *Attorneys for Defendants*

9 Michael W. Daugherty, ESQ. (Co. Bar No. 49074)
10 *Pro Hac Vice*

11 Ramsey L. Kropf, ESQ. (Co. Bar No. 21528)
12 *Pro Hac Vice*

13 SOMACH SIMMONS & DUNN
14 1155 Canyon Blvd., Suite 110
15 Boulder, CO 80302
16 Telephone (916) 446-7979
17 mdaugherty@somachlaw.com
18 rkropf@somachlaw.com

19 Frank Lawrence, ESQ. (Ca. Bar No. 147531)
20 Zehava Zevit, ESQ. (Ca. Bar No. 230600)
21 LAW OFFICE OF FRANK LAWRENCE
22 111 Bank St. No. 175
23 Grass Valley, CA 95945
24 Telephone: (530) 362-8434
25 frank@franklawrence.com
26 zehava@franklawrence.com

27 *Attorneys for Defendant-Intervenor*

1 WHEREAS, on August 27, 2024, Plaintiff Save Our Forest Association, Inc.
2 (“SOFA”) filed its First Amended Complaint for Injunctive and Declaratory Relief”
3 [ECF No. 24];

4 WHEREAS, Defendants (“USFS”) filed their Answer on November 8, 2024
5 [ECF No. 29];

6 WHEREAS, on September 11, 2025, the Yuhaaviatam of San Manuel Nation’s
7 (“Nation”) Motion to Intervene was granted [ECF No. 75];

8 WHEREAS, on August 18, 2025, and September 12, 2025, this Court entered
9 orders [ECF Nos. 72, 76] establishing a briefing and hearing schedule for preparation
10 of the administrative record (“AR”) and briefing of SOFA and USFS’s motions for
11 summary judgment];

12 WHEREAS, on September 29, 2025, the AR was lodged [ECF No. 77] by
13 USFS, and on October 20, 2025, SOFA filed a motion to complete the AR [ECF No.
14 81], which was opposed by USFS on November 3, 2025 [DKT No. 84], and SOFA is
15 presently drafting its reply;

16 WHEREAS, on October 9, 2025, Nation filed its Motion to Dismiss [ECF No.
17 79], and USFS filed their opposition to the same on November 3, 2025 [ECF No. 83],
18 and SOFA is presently drafting its opposition;

19 WHEREAS, on November 3, 2025, the Court [ECF No. 85] vacated the
20 hearings and associated briefing schedules noticed for November 24, 2025, on the
21 Nation’s Motion to Dismiss [ECF No. 79] and on SOFA’s Motion to Complete the
22 Administrative Record [ECF No. 81];

23 WHEREAS, the mediation was set for October 21, 2025, [ECF No. 71], which
24 date was vacated as a result of the shutdown, and the Parties have reached out to the
25 mediator and expect mediation to be conducted in January 2026;

26 WHEREAS, the Parties wish to minimize their procedural disputes and
27 proceed to resolution of this case in an expedited, yet orderly, manner by having the
28

1 Court set a schedule for briefing dispositive motions and cross-motions for summary
2 judgment;

3 NOW THEREFORE, the Parties hereby stipulate and agree, and request that
4 the Court enter an order setting the following schedule:

5 **Mediation**

6 1. Mediation shall be scheduled for January 6, 2026;

7 **Motion to Complete the Administrative Record**

8 2. SOFA's reply in support of its Motion to Complete the AR shall be filed no
9 later than December 7, 2025;

10 3. The Hearing, if any, on the Motion to Complete the AR shall be held on
11 January 5, 2026;

12 **Motion to Dismiss**

13 4. The hearing on the Nation's Motion to Dismiss shall be calendared no earlier
14 than March 2, 2026. SOFA shall file its opposition to the Nation's Motion to Dismiss
15 on or before Monday, February 2, 2026, and the Nation shall file its reply briefs to
16 both the USFS and SOFA's opposition briefs on or before Monday, February 16,
17 2026;

18 **Motions for Summary Judgment**

19 5. On or before the 30th day after the resolution of mediation, final resolution of
20 the Motion to Complete the Administrative Record, whichever is later, SOFA shall
21 file its summary judgment papers, including a statement of undisputed facts ("SUF"),
22 with SOFA's facts and disputes numbered,¹ and with the memorandum of points and
23 authorities not to exceed 25 pages;

24 6. On or before 60 days after the filing of SOFA's Summary Judgment Papers,
25 USFS shall file their cross motions for summary judgment and oppositions to
26

27 _____

28 ¹ The Parties shall follow the direction in this Court's standing order of March 24, 2016.

1 SOFA's motion for summary judgment and accompanying SUF/Statement of
2 Genuine Disputes of Material Fact, and with the memorandum in support thereof not
3 to exceed 30 pages;

4 7. On or before 45 days after the filing of USFS's cross motion/opposition, SOFA
5 shall file its opposition/reply thereto, of no more than 20 pages along with an
6 accompanying Statement of Genuine Disputes of Material Fact;

7 8. On or before 30 days after the filing of SOFA's opposition/reply, USFS shall
8 file their reply, of no more than 15 pages;

9 9. Any claims or defenses available at the time but not raised during summary
10 judgment briefing will be deemed to have been waived;

11 10. All briefing by Federal Defendants shall be joint;

12 11. Because the schedule presented above for production and judicial review of the
13 merits of Plaintiff's claims based on the Administrative Record in accordance with
14 the Administrative Procedure Act ("APA"), 5 U.S.C. § 706, is intended to be the full
15 procedure for resolving this case on the merits, the Parties respectfully request that
16 the Court vacate its March 6, 2025 "Civil Trial Scheduling Order," ECF No. 40.

17 12. Notwithstanding the immediately preceding paragraph, SOFA reserves the
18 right to petition this Court for admission of extra-record evidence.
19

20 Dated: December 2, 2025

Respectfully Submitted,

21
22 By: /s/ Rachel S. Doughty

23 GREENFIRE LAW, PC

24 Rachel S. Doughty

25 2478 Adeline Street, Suite A

26 Berkeley, CA 94703

27 Ph/Fax: (510) 900-9502

28 Email: rdoughty@greenfirelaw.com

Attorneys for Plaintiff

1
2 Dated: December 2, 2025

Respectfully Submitted,

3
4 By: /s/ Andrew A. Smith

5 UNITED STATES DEPARTMENT OF
6 JUSTICE
7 Andrew A. Smith
8 Environment & Natural Resources Division
9 201 Third Street NW, Suite 900
10 Albuquerque, NM 87102
11 Phone: (202) 598-3803
12 Email: andrew.smith@usdoj.gov

Attorneys for Defendants

13 Dated: December 2, 2025

Respectfully Submitted,

14
15 By: /s/ Frank Lawrence

16 LAW OFFICE OF FRANK LAWRENCE
17 Frank Lawrence, Esq.
18 Attorneys for Specially Appearing
19 Intervenor Yuhaaviatam of San Manuel
20 Nation

Attorneys for Defendant-Intervenor

21
22 Pursuant to Local Rule 5-4.3.4, I hereby attest that each of the other signatories
23 concurs in the filing of this document.

24
25 Dated: December 2, 2025

/s/ Rachel S. Doughty

26 Rachel S. Doughty

CERTIFICATE OF SERVICE

I hereby certify that on December 2, 2025, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Central District of California using the CM/ECF system, which will send notification of this filing to the attorneys of record.

/s/ Rachel Doughty
Rachel Doughty